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7 *Attorneys for Proposed Intervenor*
COMEDY CLUB INC.

8 UNITED STATES DISTRICT COURT
9
10 CENTRAL DISTRICT OF CALIFORNIA—WESTERN DIVISION

11 IMPROV WEST ASSOCIATES,

12 Plaintiff,

13 v.

14 ROBERT HARTMANN; LEVITY
PRODUCTIONS LLC; LEVITY
ENTERTAINMENT GROUP, INC.;
15 LEVITY ENTERTAINMENT GROUP,
LLD; E-COMIC BRANDING, INC.;
16 and DOES 1 through 10 inclusive,

17 Defendants.

18 ROBERT HARTMANN, an individual;
19 LEVITY PRODUCTIONS LLC, a
Delaware limited liability company;
20 LEVITY ENTERTAINMENT GROUP,
INC., a California corporation; LEVITY
21 ENTERTAINMENT GROUP, LLC, a
Delaware limited liability company; E-
22 COMIC BRANDING, INC., a California
corporation,

23 Counterclaimants,

24 v.

25 IMPROV WEST ASSOCIATES, a
26 California limited partnership, and
DOES 1 through 10 inclusive,

27 Counterdefendants.
28

Case No. CV 11-07103 PSG (SHx)

**NOTICE OF INTENT OF COMEDY
CLUB INC. TO FILE A MOTION TO
INTERVENE IN THIS ACTION
PURSUANT TO FED. R. CIV. P. 24 (A)
AND (B)**

Complaint filed: August 29, 2011

1 PLEASE TAKE NOTICE that Comedy Club Inc. is an indispensable, yet
2 missing, party that actually owns the www.improv.com website and holds the rights to
3 the uses of which Plaintiff Improv West Associates complains in this action. Comedy
4 Club Inc., therefore, intends to move to intervene in this action as of right pursuant to
5 FED. R. CIV. P. 24(a) and (b) on the ground that (1) it claims an interest relating to the
6 property or transaction that is the subject of this action, and is so situated that
7 disposing of this action will impair or impede its ability to protect its interests, unless
8 the Defendants named in this action adequately represent that interest, and (2) it has a
9 claim or defense that shares with the main underlying action common questions of
10 law and fact.

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12 Dated: October 13, 2011 SHEPPARD MULLIN RICHTER & HAMPTON LLP

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14 By /s Kent R. Raygor
15 KENT R. RAYGOR

16 Attorneys for Proposed Intervenor
17 COMEDY CLUB INC.

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